

JASON W. SUH (SBN: 256573)
GOLDBERG SEGALLA LLP
777 S. Figueroa Street, Suite 2000
Los Angeles, CA 90017-5818
Telephone: 213-415-7200
E-mail: jsuh@goldbergsegalla.com

Attorneys for Defendant
PROMINENT ESCROW SERVICES, INC.
(*Erroneously sued as* PROMINENT
ESCROW SERVICE)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DEBRA BAREFIELD,

Plaintiff,

vs.

HSBC MORTGAGE SERVICES, INC.;
SUMMIT MANAGEMENT COMPANY,
LLC; U.S. BANK TRUST, N.A.; LSF10
MASTER PARTICIPATION TRUST;
CALIBER HOME LOANS, INC.;
NICKOLAS E. TENHEFF; LYNÆ M.
TENHEFF; PROMINENT ESCROW
SERVICE; CHICAGO TITLE COMPANY;
AND DOES 1-50, INCLUSIVE,

Defendants.

CASE NO. 1:21-CV-00613-JLT

**STIPULATION AND
[~~PROPOSED~~] ORDER TO
EXTEND TIME TO RESPOND
TO FIRST AMENDED
COMPLAINT BY NOT MORE
THAN 28 DAYS (L.R. 144)**

(Doc. 32)

WHEREAS, Plaintiff Debra Barefield (“Plaintiff”) served Defendant Prominent Escrow Services, Inc. (“Prominent”) with her First Amended Complaint (“FAC”) on August 30, 2021; and

WHEREAS, Prominent was not served with the original complaint; and

WHEREAS, Prominent’s response to the FAC is now due on September 20, 2021, and

WHEREAS, Prominent requires additional time to prepare its responsive pleading after having only recently retained legal counsel; and

WHEREAS, Prominent and Plaintiff have agreed to stipulate to a 28-day extension of time, up to and including, October 18, 2021 for Prominent's response to the FAC; and

WHEREAS, there have been no prior extensions of time to respond to the FAC.

NOW THEREFORE, Prominent, by and through its undersigned counsel, and Plaintiff, *in Pro Per*, stipulate and agree that Prominent shall have an extension of time up to and including **October 18, 2021** to respond to the FAC in this action.

Dated: September 20, 2021

GOLDBERG SEGALLA LLP

By: /s/ Jason W. Suh
Jason W. Suh (SBN: 256573)
Attorneys for Defendant
Prominent Escrow Services, Inc.

Dated: September 20, 2021

By: /s/ Debra Barefield
Plaintiff, *in Pro Per*

[PROPOSED] ORDER

Based upon the stipulation of parties, the Court **ORDERS**:

1. The stipulation is **GRANTED**. Prominent Escrow Services, Inc.'s SHALL file a responsive pleading no later than October 18, 2021.

IT IS SO ORDERED.

Dated: **September 20, 2021**

/s/ Jennifer L. Thurston
CHIEF UNITED STATES MAGISTRATE JUDGE